

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF NEW JERSEY

**Caption in Compliance with D.N.J. LBR 9004-1(b)**

DENISE CARLON, ESQUIRE  
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Attorneys for Secured Creditor  
Cross Country Mortgage, LLC

In Re:

Recardo Rodriguez,

Debtor.

Case No.: 23-12894-ABA

Adv. No.: \_\_\_\_\_

Chapter: 13

Hearing Date: 10/10/2023

Judge: Altenburg

**ADJOURNMENT REQUEST FOR CHAPTER 13**

1. I, Denise Carlon, Esq.,  
 am the attorney for: Cross Country Mortgage, LLC  
 am self-represented  
Phone number: 215-627-1322  
Email address: dcarlon@kmllawgroup.com

2. I request an adjournment of the following hearing:  
Matter: Secured Creditor's Motion for Relief from Stay (Docket # 21)  
Current hearing date and time: 10/10/2023 @ 10:00 a.m.  
New date requested: 10/24/2023 @ 10:00 a.m.  
Reason for adjournment request: To allow the parties time to amicably resolve the issues at hand.

3. I request an adjournment of confirmation:

Current confirmation date and time: \_\_\_\_\_

New date requested: \_\_\_\_\_

Reason for adjournment request: \_\_\_\_\_  
\_\_\_\_\_

Confirmation has been adjourned \_\_\_\_\_ previous times

Trustee payments are current through \_\_\_\_\_

The meeting of creditors under § 341(a) of the Code  was conducted  was not conducted

4. Consent to adjournment:

I have the consent of all parties.  I do not have the consent of all parties (explain below): \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

I certify under penalty of perjury that the foregoing is true.

Date: 10/05/2023

/s/ Denise Carlon

Signature

**Pursuant to D.N.J. LBR 5071-1(b) an adjournment  
request must be made not later than 3 days before the hearing.**

**NOTE: THIS FORM MUST BE SUBMITTED TO THE CHAPTER 13 TRUSTEE, AND IS NOT  
REQUIRED WHEN SEEKING THE ADJOURNMENT OF A 341(a) MEETING OF CREDITORS.**

**OFFICIAL USE ONLY:**

The request for adjournment is:

- Granted      New hearing date: 10/24/23 @ 10 am       Peremptory
- Granted over objection(s)      New hearing date: \_\_\_\_\_       Peremptory
- Denied

**IMPORTANT: If your request is granted, you must notify interested parties who are not electronic filers of the new hearing date.**

*rev.10/1/15*